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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

CHRISTOPHER KOHLS,
Plaintiff,
v.
ROBERT A. BONTA, et al.,
Defendants.

Case No. 2:24-cv-02527-JAM-CKD
**STIPULATION FOR AMENDED STAY OF
ENFORCEMENT OF AB 2655**

Judge: John A. Mendez

THE BABYLON BEE, LLC, et al.,
Plaintiffs,
v.
ROBERT A. BONTA, et al.,
Defendants.

Case No. 2:24-cv-02787-JAM-CKD

RUMBLE, INC., et al.,
Plaintiffs,
v.
ROBERT A. BONTA, et al.,
Defendants.

Case No. 2:24-cv-03315-JAM-CKD

X CORP.,
Plaintiff,
v.
ROBERT A. BONTA, et al.,
Defendants.

Case No. 2:24-cv-03162-JAM-CKD

STIPULATION

1
2 1. On November 15, 2024, Judge John A. Mendez entered an
3 Order to Stay Enforcement of Assembly Bill ("AB") 2655 (Cal. Elec.
4 Code §§ 20510-20520), whereby Defendants Rob Bonta and Shirley N.
5 Weber were "ORDER[ED] . . . to stay of enforcement of AB 2655
6 during the 2024 election cycle, from January 1-4, 2025." Order to
7 Stay Enforcement, *Kohls v. Bonta*, No. 2:24-cv-02527-JAM-CKD (E.D.
8 Cal. Nov. 15, 2024), ECF 25.

9 2. The end date on the stay of enforcement in the November
10 15, 2024 Order was premised, in part, on the notion that there were
11 no elections scheduled in California that would trigger the
12 substantive provisions of AB 2655 until the 2026 electoral cycle.

13 3. On December 11, 2024, California Governor Gavin Newsom
14 announced special elections for California Senate District 36 and
15 California Assembly District 32 to fill new vacancies in those
16 districts. See Governor Newsom proclaims special election for
17 Senate District 36, Assembly District 32, Governor Gavin Newsom
18 (Dec. 11, 2024), available at
19 [https://www.gov.ca.gov/2024/12/11/governor-newsom-proclaims-](https://www.gov.ca.gov/2024/12/11/governor-newsom-proclaims-special-election-for-senate-district-36-assembly-district-32/)
20 [special-election-for-senate-district-36-assembly-district-32/](https://www.gov.ca.gov/2024/12/11/governor-newsom-proclaims-special-election-for-senate-district-36-assembly-district-32/).

21 4. These special elections alter the premise upon which the
22 November 15, 2024 stay of enforcement was based, because they
23 trigger the substantive provisions of AB 2655.
24

1 5. Given this material change of circumstances, Defendants
2 now agree to stay enforcement of AB 2655 during the law's operative
3 dates for these special elections, through June 28, 2025.

4 6. Given this stipulation, Plaintiffs will not seek a
5 preliminary injunction staying enforcement of AB 2655 at this time.
6 Plaintiffs reserve the right to bring, and Defendants reserve their
7 rights to oppose, a motion for preliminary injunction or temporary
8 restraining order covering the period after June 28, 2025.

9 7. Defendants represent that they do not intend to enforce
10 the identification and reporting requirements of AB 2655, including
11 California Election Code §§ 20514(a) and 20515(a), unless and until
12 the law's other requirements – those set forth in §§ 20513 and
13 20514 – are triggered by an election in California that is covered
14 by AB 2655. Accordingly, Defendants will not enforce any
15 identification and reporting requirements of AB 2655, including §§
16 20514(a) and 20515(a), until at least June 28, 2025.

1 Dated: January 2, 2025

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**[PROPOSED] ORDER FOR AMENDED
STAY OF ENFORCEMENT OF AB 2655**

Judge: John A. Mendez

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RUMBLE, INC., et al.,
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Case No. 2:24-cv-03315-JAM-CKD

X CORP.,
Plaintiff,
v.
ROBERT A. BONTA, et al.,
Defendants.

Case No. 2:24-cv-03162-JAM-CKD

1 Before the Court are Plaintiff X Corp., Plaintiff Christopher
2 Kohls, Plaintiffs The Babylon Bee, LLC and Kelly Chang Rickert,
3 Plaintiffs Rumble Inc. and Rumble Canada Inc., and Defendants Rob
4 Bonta and Shirley N. Weber's joint stipulation for an amended stay
5 of enforcement of Assembly Bill ("AB") 2655 (Cal. Elec. Code §§
6 20510-20520). The Court thus hereby ORDERS:

7 1. Defendants Rob Bonta and Shirly N. Weber to stay
8 enforcement of AB 2655 in its entirety, including §§ 20514(a) and
9 20515(a), through June 28, 2025.

10 IT IS SO ORDERED.

11 DATED: _____

12 _____
13 Honorable John A. Mendez
14 Senior United States District Judge
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